

# **Exhibit 10**

**AFFIDAVIT and DECLARATION OF MARY ELLEN BALCHUNIS**

MARY ELLEN BALCHUNIS, being duly sworn, declares, under penalty of perjury pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. I am a resident of Haverford Township, Ardmore, Pennsylvania, in Delaware County.
2. I voted in the 2016 general election in my district, the 3<sup>rd</sup> Ward, 4<sup>th</sup> Precinct.
3. I voted on an electronic voting machine that had no paper receipt for me to review, so I cannot be sure that my vote was accurately recorded or counted.
4. I appeared on the ballot this year as a candidate for Congress, in Pennsylvania's 7<sup>th</sup> Congressional District. I ran as a Democrat.
5. I submit this affidavit/declaration to explain the hurdles I have faced in trying to seek a recount of votes in Delaware County.
6. I joined a group of volunteers who were trying to file petitions for a recount of votes and a forensic analysis of electronic voting machines in Pennsylvania.
7. There was no clear information from the Pennsylvania Department of State or the Delaware County Board of Elections about when the County had completed its computation of the vote or whether/when it had certified the vote, meaning that there was no clear information about the deadline by which to file petitions for a recount. I was a candidate in the race, and I never received notice of certification or a meeting about certification from the State or Board of Elections.
8. Originally, the volunteers believed that Delaware County was not eligible for a recount and so I and other volunteers were told not to bother gathering petitions to file.

9. However, I later spoke with a volunteer attorney who believed it may not be too late to file petitions for a recount. Accordingly, I gathered petitions for myself and two neighbors.

10. I attempted to deliver petitions to the Delaware County Board of Elections. I arrived at the office a few minutes before the office was set to close. At first, the employee at the Board told me that the office was closed, but I pointed out that it still had a few minutes before it closed. She initially refused to accept my petitions, but eventually she relented and agreed to time-stamp them.

11. When I asked the Chief Clerk whether I had followed the appropriate procedures, she told me that she would not give me any information and could not even tell me if I was in the right place.

12. I felt like the County Board of Elections was giving me the run-around and refusing to provide any clear instructions or answers. It appeared to me that the Board was uninterested in helping citizens seek recounts. In addition, as our judges and County Council in Delaware County are Republicans as well as most of the County employees, I felt that the employee recognized my name, as a congressional candidate, and may not have wanted to help a Democrat.

13. I am concerned that my vote and the votes of my fellow citizens were not counted accurately in the election, and would like a manual recount of every paper ballot and a forensic examination of the electronic voting systems in Pennsylvania to make sure the vote had integrity and every vote counted. My race was also part of DNC emails that the intelligence community said were hacked by the Russians; therefore, the forensic exam of the DRE machines is extremely important to me.

Dated: December 5, 2016  
Haverford, Pennsylvania

  
MARY ELLEN BALCHUNIS

Sworn to and subscribed before me  
this 5<sup>th</sup> day of December, 2016.

  
NOTARY PUBLIC

